



ORIGINAL

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IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ DEC 29 2020 ★

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

"Second Amended Complaint"

Ftema Rayson

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

The City of New York  
Police Officer Troy Ann Safi  
Police officers John Doe 1-4 (whose names & shield numbers are unknown)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

### Complaint for Violation of Civil Rights

(Non-Prisoner Complaint)

Case No. 19-cv-6265 (PNC) (VMS)  
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☒ No  
(check one)

### NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in *forma pauperis*.

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U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**A. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Ftéma Rayson</u>
Street Address	<u>PO Box 100676, Brooklyn NY 11210</u>
City and County	<u>Brooklyn Kings</u>
State and Zip Code	<u>New York 11210</u>
Telephone Number	<u>347-493-2019</u>
E-mail Address	<u>Frayson@yahoo.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name	<u>The City of New York</u>
Job or Title (if known)	<u>City of New York</u>
Street Address	<u>100 Church Street</u>
City and County	<u>New York City</u>
State and Zip Code	<u>New York 10007</u>
Telephone Number	<u>718 724 5200 / 212-356-3235</u>
E-mail Address (if known)	<u>pressooffice@law.nyc.gov</u>

## Defendant No. 2

Name

P.O. Trayn SAFI

Job or Title  
(if known)

police officer

Street Address

301 Gold Street

City and County

Brooklyn Kings

State and Zip Code

New York 11201

Telephone Number

718-875-6811

E-mail Address  
(if known)

Ernest.Diggs@Nypd.org

## Defendant No. 3

Name

Police officers John Doe 1-4

(whose names  
& shield numbers  
are unknown)Job or Title  
(if known)

police officer

Street Address

301 gold Street

City and County

Brooklyn Kings

State and Zip Code

New York 11201

Telephone Number

718-875-6811

E-mail Address  
(if known)

Anita.Sandval@Nypd.org

## Defendant No. 4

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

#### A. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☒ State or local officials (a § 1983 claim)  
☐ Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

First amendment, Fourth Amendment,  
 14<sup>th</sup> Amendment

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

(The claim does not cover *Bivens*)

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

The city of New York violated my 1<sup>st</sup> amendment under color of law by using the trespass statute to affect prior restraint on my right to trespass.  
 Police Officer Troy Ann Saffi violated my 1<sup>st</sup> amendment right under color of law by trespassing on me for exercising my right.

Police officers John Doe 1-4 (whose names & shield numbers unknown) violated my 1<sup>st</sup> amendment under color of law by using the trespass statute to affect prior restraint on my right to trespass. False arrest deadly force unreasonable seizure

**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

The plaintiff has damage to hands, head, legs and back. During the assault, the plaintiff suffered from full body damage by defendant. Plaintiff went to hospital and is currently in physical therapy. Excessive Force BATTERED from defendant during unlawful detainment caused these injuries.

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I am seeking 100 million in damages. The Basis for these claims is mental anguish & Humiliation along with willful & egregious violation of my 1st & 14th amendment rights. (Fourth amendment rights as well in violation)

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

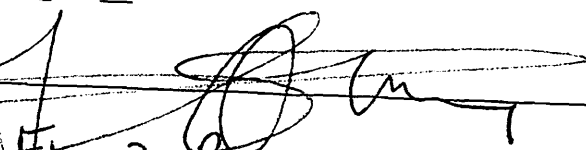
**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 29, 2020

Signature of Plaintiff

Printed Name of Plaintiff

  
Hema Rayson